

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
)	
Revision of the Commission's Rules to Ensure)	PS Docket No. 07-114
Compatibility with Enhanced 911 Emergency Calling)	FCC 19-20
Systems)	
)	

COMMENTS OF AIRWAVE DEVELOPERS LLC

Airwave Developers LLC (“AWD”) hereby submits these comments in response to the *Fourth Further Notice of Proposed Rulemaking* in above-captioned proceeding.

AWD serves the interests of property owners in facilitating and managing the negotiation, implementation and provision of wireless carrier cell site deployment on private property. AWD’s wholly owned subsidiary, Citizens Broadband, was established to focus AWD’s efforts on indoor wireless implementation and deployment, including deploying over the new Citizens Broadband Radio Service (“CBRS”) spectrum soon to be licensed by the Commission.¹

This proceeding will result in compelling new obligations for wireless carriers to assure the ability of public safety representatives to quickly locate a party in distress who calls for emergency services from a wireless phone while inside a building. The Commission must make absolutely sure that any call to emergency services from a wireless phone gets nearly identical priority as a call from a landline phone. This proceeding is the vehicle for making sure those rules are clear and hard deadlines are established.

¹ For further information on AWD and Citizens Broadband, see www.airwavedevelopers.com and www.citizensbroadband.com.

AWD agrees with the Commission's proposed deadlines for implementation of new indoor wireless location requirements by wireless carriers in the respective largest 25 and 50 U.S. markets. If anything, these deadlines should be moved up and not extended. Like public safety agencies, property owners have a compelling interest in Commission rules that mandate the most accurate ability to locate a party in need while inside a building to protect life and property. The Commission should promulgate final rules and establish strict deadlines for compliance.

AWD also agrees the Commission should adopt at least the proposed 3 meter metric for wireless handset location accuracy. As demonstrated by other commenters in this proceeding, that metric is currently able to be met with current technology; however, 100% of calls should be subject to the metric (versus the 80% proposed). By the deadlines proposed by the Commission, the alternative approaches and technological development to address and solve this problem will continue to accelerate and yield better and more accurate solutions such that it should be feasible to require at least a 3 meter metric for 100% of in building wireless calls. In that respect, the Commission must ensure it does not pick winners and losers or favor one solution over another.

The robust market for in building wireless capacity and coverage and related technological advances will solve this problem once firm deadlines are established. CBRS is one such technology and spectrum advance that promises to be a major solution for helping improve in building wireless location services. With neutral host CBRS solutions, low cost antennas installed on each floor of a building (and depending on the size of the building footprint there may be multiple antennas on each floor) will generate data allowing for the public safety answering point ("PSAP") to pinpoint the floor and the section of the floor from which the wireless call was made through detection by the network of which antenna serving the building


picked up the call. Therefore, AWD believes that it is not only possible to detect floor level calls but floor level data should be required – and such information should be required to be transmitted to PSAPs. Used independently or in conjunction with other location technologies such as NavNet, a flexible approach to solving this problem should enable the PSAP to precisely and accurately locate the caller.

It is critical to remember in evaluating these proposed rules that if there is poor or no wireless service inside a building, no solution will be suitable in that particular building as the call simply may not go through. In these cases (which are numerous), it is obvious none of the solutions that rely on and assume a wireless caller will have an adequate signal inside a building will work! The latter raises the important point that the Commission's broader policies must focus on creating a regulatory environment that facilitates the fastest and best indoor wireless coverage possible. CBRS is one such area where the Commission must ensure its rules and policies allow parties to rapidly and efficiently access spectrum and deploy services coast to coast (and particularly on the coasts where the majority of the U.S. population resides).

AWD respectfully requests the Commission consider these comments in its final determination in enacting rules in this proceeding.

Respectfully submitted,

AIRWAVE DEVELOPERS LLC

By: 
Rudolph J. Geist, CEO
2801 M Street NW
Washington, DC 20007
(202) 602-1000

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